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COMMUNICATIONS

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November 20, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
12 Street Lobby-TW-A325
Washington, DC 20554

Re: Amendment of Section 73.202(b)
RM Table of Allotments
FM Broadcast Stations
Gray, GA, Forsyth, GA, Irwinton, GA,
Atlanta, GA, Washington, GA &
Watkinsville, GA

01-281

Dear Ms. Salas:

Transmitted herewith on behalf of New Tracks Media is an original & four copies of a Counterproposal to the Commission's Notice of Proposed Rulemaking (NPRM), DA 01-281 (RM-10287), released October 5, 2001, that proposes to allot Channel 261A to Watkinsville, GA as it's first local service. The NPRM was issued due to a petition filed by Southern Broadcasting Companies, Inc. Southern is the assignee of the license of WXKT, Channel 261A, Washington, GA, and in their petition is requesting a change of city of license from Washington to Watkinsville. New Tracks Media is re-filing it's proposal of September 1, 2001 to allocate 261A to Gray, GA as a counterproposal to NPRM DA-01-281 (RM-10287).

Should any questions arise concerning this matter, please contact me directly.

Sincerely,



H. David Hedrick
PO Box 27
Gray, GA 31032
(478) 986-4435

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b),
FM Broadcast Stations
(Watkinsville & Washington, Georgia)

MM Docket No.01-281
RM-10287
RM-_____

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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COMM. PROC.

COUNTERPROPOSAL

New Tracks Media hereby respectfully files this counterproposal to the Commission's Notice of Proposed Rule Making ("NPRM"), DA 01-281, RM 10287, released October 5, 2001* that proposes to allot Channel 261A to Watkinsville, Georgia, as its first local service. The NPRM was issued due to a petition filed by Southern Broadcasting Companies, Inc. New Tracks Media requests the Commission to deny the Southern proposal, and instead, amend Section 73.202(b) of the Rules to add Channel 261A to Gray, Georgia, as its second local service. In support whereof, the following is shown:

* This counterproposal is mutually exclusive with the proposal to allot Channel 261A to Watkinsville, Georgia. Comments and counterproposals are due by November 26, 2001, so this counterproposal is timely filed.

BACKGROUND

1. On September 1, 2001, New Tracks Media (NTM) filed a petition to assign Channel 261A to Gray, Georgia as its second aural service. Due to frequent inability to access the Commission Database in late summer it was unknown to NTM that Southern Broadcasting Companies, Inc. (SBC) had filed a petition to move Channel 261A from Washington, Georgia to Watkinsville, Georgia. On October 4th, 2001, SBC filed a petition asking the Commission to dismiss the NTM petition. As of this date, NTM has received no notice of dismissal. Accordingly, to protect it's interests, NTM is re-filing it's petition as a counterproposal.

NTM PETITION

New Tracks Media hereby petitions the Federal Communications Commission for the initiation of a rulemaking proceeding to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules) to delete FM Channel 261A from Forsyth, Georgia, substitute Channel 279A at Forsyth, delete Channel 279A from Irwinton, Georgia, substitute Channel 278A at Irwinton, and assign Channel 261A as the second aural service to Gray, Georgia.

Gray, Georgia (see Exhibit A) is an incorporated community, with a 2000 U. S. Census population of 1,811. The city is governed by an elected Mayor, and five City Council members, and is the county seat of Jones County (2000 pop. 23,639). Gray has it's own post office & zip code (31032) and provides complete municipal services (Police, Fire Department) to it's citizens. There are hundreds of retail, wholesale, municipal and agricultural establishments, located in Jones County, with many of them

located in or very near the Gray corporate limits. These include six banks, and four medical clinics. Most major religious denominations are represented locally (Gray First Baptist, Gray United Methodist, & 21 others). Schools include Gray Elementary, Dames Ferry Elementary, Clifton Ridge Elementary, Califf Middle School, Mattie Wells Elementary & Jones County High.

Presently, Gray has no local radio service, even though there is a licensed station. WJZY-FM is owned by Clear Channel, with a transmitter near Smarr, Georgia. Programming originates from their studio complex in the Macon metro, and features no local news or items of community interest for Gray.

As indicated in the attached Engineering Statement (Exhibit B), Channel 261A can be assigned to Gray, using the reference coordinates of 32-59-11 N, 83-34-51 W(NAD27). This reflects a site restriction SW of the Gray city center. At this site, all minimum distance separation requirements of Section 73.202(b) of Commission Rules are met (see notations in Exhibit B regarding WQMJ, Forsyth, GA, WVKX, Irwinton, Georgia; and WVEE, Atlanta, GA), as well as the principal community contour coverage requirements of Section 73.315.

In the event that Channel 261A is allotted to Gray, Georgia, New Tracks Media will file a timely application for a Construction Permit to operate a new FM broadcast station at Gray, and, if authorized, will promptly construct the station.

This petition is filed under the recently enacted rules regarding permissible downgrading of Class C stations to Class C0 (FCC 00-368, Section 73.207 as amended). New Tracks Media hereby requests the downgrading of station WVEE-FM, Atlanta, GA

from Class C to Class C0. Additionally, two FM Channel substitutions are necessary to facilitate the proposed Gray Allocation rulemaking: 279A for 261A at Forsyth, Georgia, and 278A for 279A at Irwinton, Georgia. Pertinent documentation will be found in Exhibit B.

The petitioner, should it be the grantee, hereby proposes and certifies, that it will reimburse all reasonable expenses that may be incurred by the licensees of WQMJ, Forsyth, Georgia, and WVKX, Irwinton, Georgia for changes that will be required to their facilities, should this petition be granted.

In Conclusion, this petition proposes to amend the FM Table of Allotments (Section 73.202(b) of the Commission's rules, as follows:

City	Present	Proposed
Gray, Georgia	243C3	243C3, 261A
Forsyth, Georgia	261A	279A
Irwinton, Georgia	279A	278A
Atlanta, Georgia	203C1, 207C1, 211C1, 216C2, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C	203C1, 207C1, 211C1, 216C2, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C0

SBC PETITION TO DISMISS

SBC bases it's October 4, 2001 dismissal petition upon three points:

1. "NTM failed to take into account SBC's proposal".

As stated above, due to inability to access the Commission database in late summer, NTM was unaware of the SBC filing until it showed up as an NPRM on

October 5, 2001.

2. "The NTM proposal is shortspaced with a petition to allocate Channel 264A to Haddock, Georgia."

The Haddock petition, which was filed by Bernice P. Hedrick, was dismissed by the Commission on March 27, 2001. (See Exhibit C)

3. "The NTM proposal shows shortspacing between the proposed allotment of Channel 279A to Forsyth, GA & the allocation of, and two applications for Channel 279A at Cussetta, Georgia".

As shown in Exhibit D, there is a clear usable area for both the allocation & the two applications for Cussetta.

GRAY VS. WATKINSVILLE

The NPRM states that the proposed Watkinsville service area already receives five full time services. It should be noted that Gray only receives four: WPEZ, WDEN, WJZY & WAYS. However, Gray has a larger population than Watkinsville.

ADDITIONAL ISSUES

NTM believes there are other issues which the Commission should consider in deciding which of these two proposals to select; one of which involves concentration of control by SBC. Accordingly, NTM reserves the right to address same in our reply comments in this proceeding.

CONCLUSION

NTM requests that the Commission allot Channel 261A to Gray, Georgia and deny the proposal to allot Channel 261A to Watkinsville, Georgia. As stated herein if the FCC

allots to 261A to Gray, NTM will file a timely application for a Construction Permit to operate a new FM broadcast station at Gray, and, if authorized, will promptly construct the station.

WHEREFORE, NTM respectfully requests the Commission to amend Section 73.202(b) of the Commission Rules, as follows:

Georgia

City	Present	Proposed
Gray	243C3	243C3, 261A
Forsyth	261A	279A
Irwinton	279A	278A
Atlanta	203C1, 207C1, 211C1, 216C2, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C	203C1,207C1,211C1, 216C2, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C0

Respectfully,



H. David Hedrick
New Tracks Media
P O Box 27
317 Stonegables Court
Gray, GA 31032
478-986-4435
478-986-4071 (fax)
November 20, 2001

EXHIBIT A



GMAA
MEMBER ASSOCIATION
www.gmanet.com

Looking for a job?
click here for job opportunities

Members

Gray *(updated August 31, 2001)*

<p>Cities by Name</p> <p>Cities by Population Size</p> <div style="text-align: center; margin-top: 10px;">  </div> <div style="background-color: black; color: white; padding: 2px; text-align: center; margin-top: 5px;"> Mail merge files now available! </div>	<p>PO Box 443 Gray, GA 31032-0443 Phone: (478) 986-5433 Fax: (478) 986-6675</p> <p>Pop: 1,811 ('00 Census) RDC: Atlanta Regional State Development Region: 6 County: Jones</p> <p>Senate: Zell Miller, Max Cleland Congressional District: 10 State Senate District: 25 State House District: 123</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Elected Officials</p> <p>Mayor: Mr. Jason E. Briley Council Member: Mr. Terrell Fulford Council Member: Mr. Benny Gray Council Member: Mr. Charlie H. Ridley Council Member: Mr. Cicero D. Turk Mayor Pro Tem: Mr. Max Joseph Wood, Jr.</p> <p>Area Economic Development Agencies</p> </div> <div style="width: 45%;"> <p>Appointed Officials</p> <p>City Clerk: Ms. Loretta Lipsey City Attorney: Ms. Joan Harris</p> <p>Area Newspapers</p> <p>The Jones County News PO Box 1538 111 Madison Street Gray, GA 31032-1538 Telephone: (478) 986-3929 Fax Number: (478) 986-1935</p> </div> </div>	<p>View Map</p> <p>More on Gray from LookSmart</p>
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NEW TRACKS MEDIA
Gray, Georgia
Petition for Rulemaking
September 1, 2001

EXHIBIT B

This engineering exhibit supports a petition to amend the FM Table of Allotments (Section 73.202(b) of the Commission rules), to assign FM Channels 261A to Gray, Georgia, 279A to Forsyth, Georgia, 278A to Irwinton, Georgia and 277C0 to Atlanta, Georgia.

Table 1 is an allocation study for Channel 261A, using the coordinates of the proposed reference site. As demonstrated, all minimum distance separation requirements of Section 73.202(b) are met from the reference site, except as noted below. In addition, as shown in Figure 1, a class A FM station constructed at this site will meet the principle city contour coverage requirement of Section 73.315. From the city center of Gray, Georgia, a site restriction to the SW is necessary to avoid short spacing with WXKT, Washington, Georgia (261A@ 33-43-50 N, 82-43-10 W (NAD27), and WSNT-FM, Sandersville, Georgia (260A@ 32-58-23 N, 82-48-34 W (NAD27).

Table 1 & Figure 1 show a severe short spacing to WQMJ, Forsyth, Georgia (261A@ 32-58-27 N, 83-52-02 W) (NAD 27). To eliminate this, and free Channel 261A for allocation to Gray, it is necessary to find a substitute channel for WQMJ. A complete spectrum search reveals that the only channel usable at WQMJ's current transmitter site is 279A, currently allocated to WVKX, Irwinton, Georgia (279A@ 32-52-48 N,

83-11-07 W) (NAD27).

Table 2 is an allocation study for Channel 279A, using the WQMJ site coordinates.

As demonstrated, all distance separation requirements are met, except a 2 km short spacing to an allocation at Cusseta, Georgia, and a severe short spacing to WVKX @ Irwinton, GA, which this petition proposes to change to Channel 278A. In order To eliminate the Cusseta short spacing, it is requested that a site restriction be placed on the Cusseta assignment. At coordinates of 32-17-35 N, 84-47-41 W, (NAD27) some 2.5 km WSW of Cusseta's center city coordinates, all short spacing between the Cusseta & proposed Forsyth allocations would be eliminated. Figure 2 demonstrates that a Class A station at the existing WQMJ site meets the requirements of Section 73.315.

Table 3 is an allocation study for Channel 278A, using reference coordinates 32-53-34 N, 83-04-02 W (NAD27). As demonstrated by table 3, with WVEE, Atlanta (277C@ 33-45-33 N, 84-20-05 W (NAD 27) downgraded from Class C to Class C0, all distance separation requirements are met. Additionally, Figure 3 shows that the requirement for principal city coverage over Irwinton would be met by WVKX at this proposed new location. As noted herein, this proposal requests the downgrade of WVEE to Class C0, per MM Docket No. 98-93, part C, paragraphs 26 through 33. In accordance with the procedure described therein, it is hereby certified that to the best of current knowledge, there is no other channel available for assignment to Gray, Georgia. Therefore it is requested that the Commission issue an order to show cause to the licensee of WVEE. It should be noted that in an informal conversation with the Atlanta office of the Federal

Aviation Administration, it has been determined that it would be "highly unlikely" that WVEE would be granted permission to increase their antenna height by 140 meters due to heavily congested airspace within the Atlanta metropolitan area. It is therefore requested that WVEE, if it intends to file for a Construction Permit to increase it's antenna height to the required 450 meters in order to preserve it's Class C status; be required to immediately submit FAA approval on any proposed new construction. Otherwise, it is feared that this petition could be unnecessarily delayed.

In conclusion, this petition proposes to amend the FM table of allotments (Sec. 73.202(b) of the Commission's Rules as follows:

City	Present	Proposed
Gray, Georgia	243C3	243C3, 261A
Forsyth, Georgia	261A	279A
Irwinton, Georgia	279A	278A
Atlanta, Georgia	203C1, 207C1, 211C1, 216C1, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C	203C1, 207C1, 211C1, 216C1, 220A, 225C1, 235C1, 241C, 253C, 259C, 277C0



H. David Hedrick
New Tracks Media
September 1, 2001

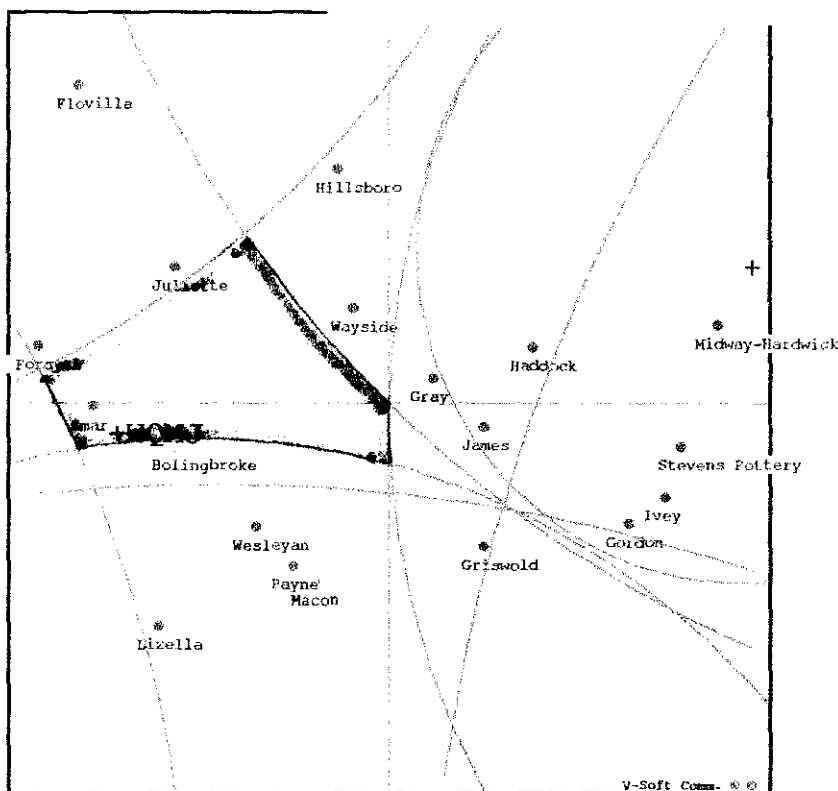
TABLE ONE

Usable/Gray, GA

FMCONT^(TM) LOCATE STUDY

Ch 261 A
100.1 MHz

N. Lat. 32 59 11
W. Lng. 83 34 51



Call	CH#	Location		D-KM	Azi	FCC	Margin
* WQMJ	261A	Forsyth	GA	26.82	267.2	115.0	-88.18
WXKT	261A	Washington	GA	115.05	43.8	115.0	0.05
WSNTEFM	260A	Sandersville	GA	72.11	91.0	72.0	0.11
WAFI	260A	Unadilla	GA	77.40	193.6	72.0	5.40
RDEL	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
WLRR	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
RDEL	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
WOBB	262C	Tifton	GA	173.25	185.4	165.0	8.25
WMCD	261C2	Statesboro	GA	179.28	108.8	166.0	13.28
WNNX	259C	Atlanta	GA	115.98	319.9	95.0	20.98
WGSY	261A	Phenix City	AL	144.05	248.9	115.0	29.05
ALLO	263C2	Anniston	AL	107.66	301.6	55.0	52.66
ALLO	261C3	Talking Rock	GA	200.91	335.5	142.0	58.91
WNSY.A	261C3	Talking Rock	GA	200.91	335.5	142.0	58.91
WWWQ.A	263C2	College Park	AL	114.03	319.1	55.0	59.03
WWWQ	263C3	College Park	AL	114.03	319.1	42.0	72.03

* This shortspace eliminated by substitution of Channel 279A for WQMJ

Dave Hedrick

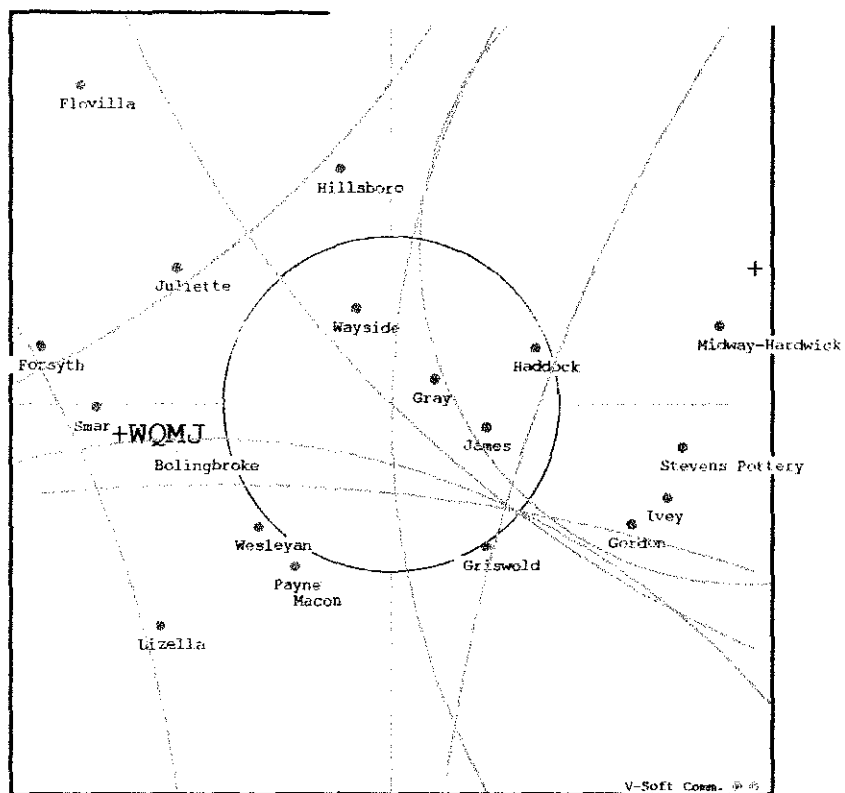
FIGURE ONE

70dBu/Gray, GA

FMCONT^(TM) LOCATE STUDY

Ch 261 A
100.1 MHz

N. Lat. 32 59 11
W. Lng. 83 34 51



Call	CH#	Location		D-KM	Azi	FCC	Margin
* WQMJ	261A	Forsyth	GA	26.82	267.2	115.0	-88.18
WXKT	261A	Washington	GA	115.05	43.8	115.0	0.05
WSNTFM	260A	Sandersville	GA	72.11	91.0	72.0	0.11
WAFI	260A	Unadilla	GA	77.40	193.6	72.0	5.40
RDEL	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
WLRR	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
RDEL	264A	Milledgeville	GA	36.63	67.1	31.0	5.63
WOBB	262C	Tifton	GA	173.25	185.4	165.0	8.25
WMCD	261C2	Statesboro	GA	179.28	108.8	166.0	13.28
WNNX	259C	Atlanta	GA	115.98	319.9	95.0	20.98
WGSY	261A	Phenix City	AL	144.05	248.9	115.0	29.05
ALLO	263C2	Anniston	AL	107.66	301.6	55.0	52.66
ALLO	261C3	Talking Rock	GA	200.91	335.5	142.0	58.91
WNSY.A	261C3	Talking Rock	GA	200.91	335.5	142.0	58.91
WWWQ.A	263C2	College Park	AL	114.03	319.1	55.0	59.03
WWWQ	263C3	College Park	AL	114.03	319.1	42.0	72.03

* This shortspace eliminated by substitution of Channel 279A for WQMJ

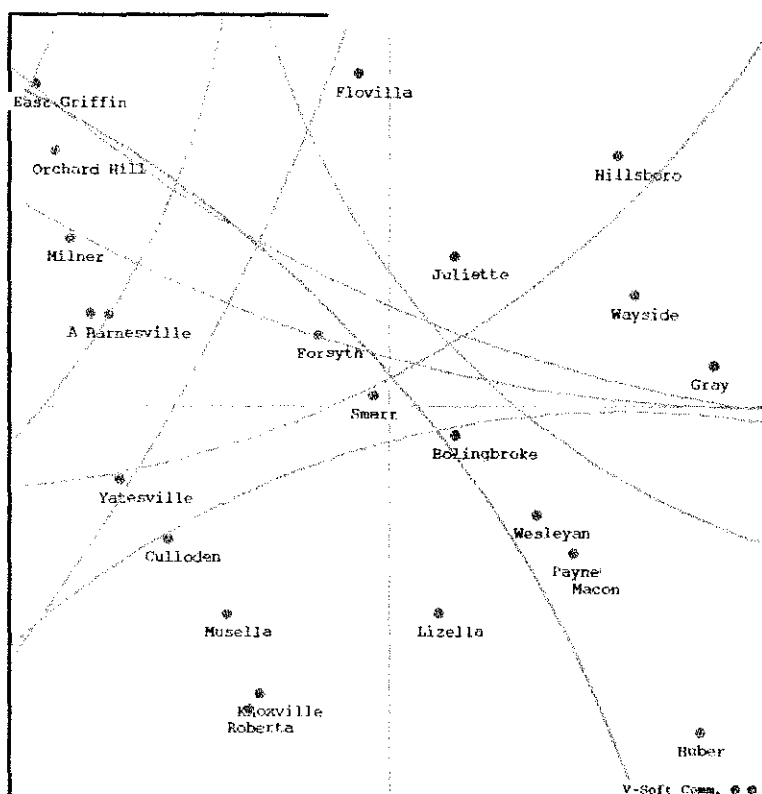
Dave Hedrick

TABLE TWO

FMCONT^(TM) LOCATE STUDY

Ch 279 A
103.7 MHz

N. Lat. 32 58 27
W. Lng. 83 52 02

Usable/Forsyth
GA

Call	CH#	Location		D-KM	Azi	FCC	Margin
* WVKX	279A	Irwinton	GA	64.63	99.2	115.0	-50.37
* * ALLO	279A	Cusseta	GA	112.97	229.0	115.0	-2.03
WVEE	277C	Atlanta	GA	97.33	333.7	95.0	2.33
WQSY	280C3	Hawkinsville	GA	92.17	166.1	89.0	3.17
RADD	279C3	Arcade	GA	146.39	14.2	142.0	4.39
WDDK	280A	Greensboro	GA	80.21	45.9	72.0	8.21
WPUP	279C3	Royston	GA	150.71	21.4	142.0	8.71
RDEL	279C3	Royston	GA	150.71	21.4	142.0	8.71
ALLO	279C	Gadsden	AL	244.05	297.6	226.0	18.05
WALRFM	281C1	La Grange	GA	102.41	298.7	75.0	27.41
WALRFM	281C1	La Grange	GA	102.41	298.7	75.0	27.41
RDEL	279C1	Gadsden	AL	244.05	297.6	200.0	44.05
WJAD	278C3	Leesburg	GA	145.56	187.1	89.0	56.56
WQEN	279C1	Gadsden	AL	257.84	292.3	200.0	57.84
RADD	276C3	East Dublin	GA	100.71	118.9	42.0	58.71
WULS	279A	Broxton	GA	180.09	148.5	115.0	65.09
WBMZ.A	279A	Metter	GA	182.56	110.0	115.0	67.56
ALLO	279A	Metter	GA	183.05	110.0	115.0	68.05

* This shortspace eliminated by substitution of Channel 278A for WVKX

* * This shortspace removable by Commission specification of restricted site

Dave Hedrick

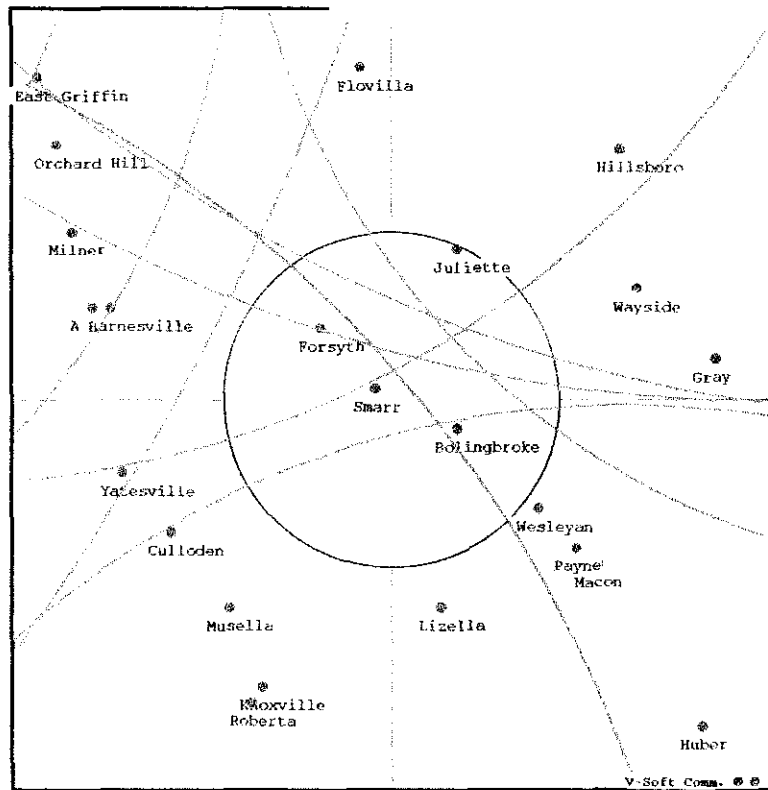
FIGURE TWO

FMCONT^(TM) LOCATE STUDY

Ch 279 A
103.7 MHz

N. Lat. 32 58 27
W. Lng. 83 52 02

70dBu/Forsyth
GA

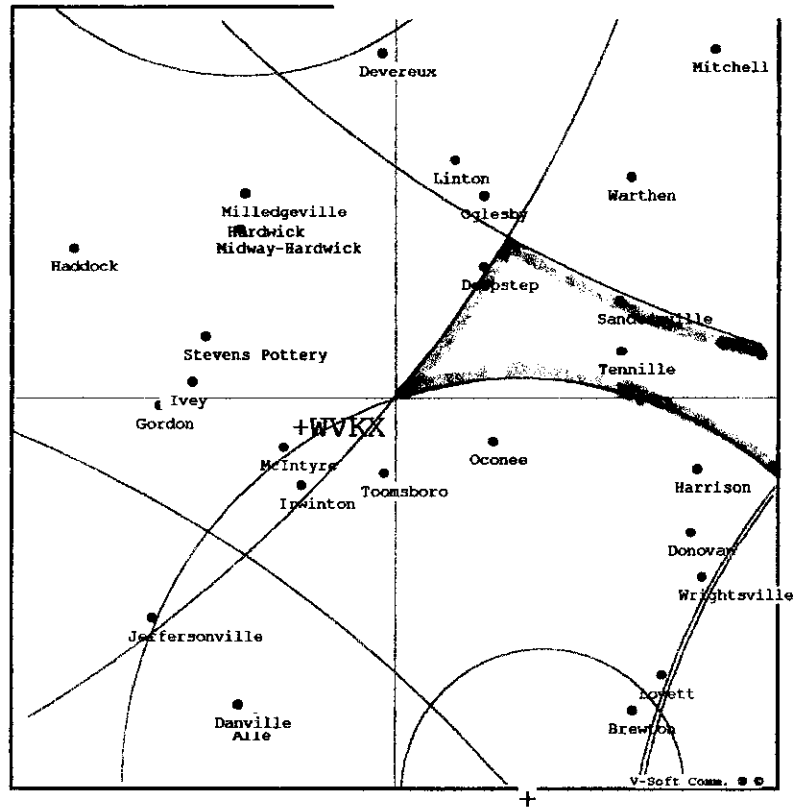


Call	CH#	Location		D-KM	Azi	FCC	Margin
• WVKX	279A	Irwinton	GA	64.63	99.2	115.0	-50.37
• • ALLO	279A	Cusseta	GA	112.97	229.0	115.0	-2.03
WVEE	277C	Atlanta	GA	97.33	333.7	95.0	2.33
WQSY	280C3	Hawkinsville	GA	92.17	166.1	89.0	3.17
RADD	279C3	Arcade	GA	146.39	14.2	142.0	4.39
WDDK	280A	Greensboro	GA	80.21	45.9	72.0	8.21
WPUP	279C3	Royston	GA	150.71	21.4	142.0	8.71
RDEL	279C3	Royston	GA	150.71	21.4	142.0	8.71
ALLO	279C	Gadsden	AL	244.05	297.6	226.0	18.05
WALRFM	281C1	La Grange	GA	102.41	298.7	75.0	27.41
WALRFM	281C1	La Grange	GA	102.41	298.7	75.0	27.41
RDEL	279C1	Gadsden	AL	244.05	297.6	200.0	44.05
WJAD	278C3	Leesburg	GA	145.56	187.1	89.0	56.56
WQEN	279C1	Gadsden	AL	257.84	292.3	200.0	57.84
RADD	276C3	East Dublin	GA	100.71	118.9	42.0	58.71
WULS	279A	Broxton	GA	180.09	148.5	115.0	65.09
WBMZ.A	279A	Metter	GA	182.56	110.0	115.0	67.56
ALLO	279A	Metter	GA	183.05	110.0	115.0	68.05

- This shortspace eliminated by substitution of Channel 278A for WVKX
- * This shortspace removable by Commission specification of restricted site

Dave Hedrick

TABLE THREE

Usable/Irwinton
GAFMCONT^(TM) LOCATE STUDYCh 278 A
103.5 MHzN. Lat. 32 53 34
W. Lng. 83 04 02

Call	CH#	Location		D-KM	Azi	FCC	Margin
• WVKX	279A	Irwinton	GA	11.13	262.7	72.0	-60.87
RADD	276C3	East Dublin	GA	42.00	161.9	42.0	0.00
WVEE	277C0	Atlanta	GA	152.19	309.6	152.0	0.19
WZSN	278C3	Greenwood	SC	162.52	29.6	142.0	20.52
WJAD	278C3	Leesburg	GA	164.49	214.7	142.0	22.49
WKKZ	224C2	Dublin	GA	43.95	159.1	15.0	28.95
WDDK	280A	Greensboro	GA	66.67	345.6	31.0	35.67
WBMZ.A	279A	Metter	GA	110.59	119.5	72.0	38.59
ALLO	279A	Metter	GA	111.04	119.4	72.0	39.04
WWSN	277C	Waycross	GA	218.60	151.6	165.0	53.60
WQSY	280C3	Hawkinsville	GA	96.28	213.4	42.0	54.28
WPUP	279C3	Royston	GA	150.25	353.0	89.0	61.25
RDEL	279C3	Royston	GA	150.25	353.0	89.0	61.25
RADD	279C3	Arcade	GA	155.48	346.1	89.0	66.48
WPMX	275C3	Statesboro	GA	114.38	115.5	42.0	72.38
RDEL	275C3	Statesboro	GA	114.38	115.5	42.0	72.38
WULS	279A	Broxton	GA	145.97	172.8	72.0	73.97

- This shortspace eliminated by substitution of Channel 278A for WVKX

Dave Hedrick

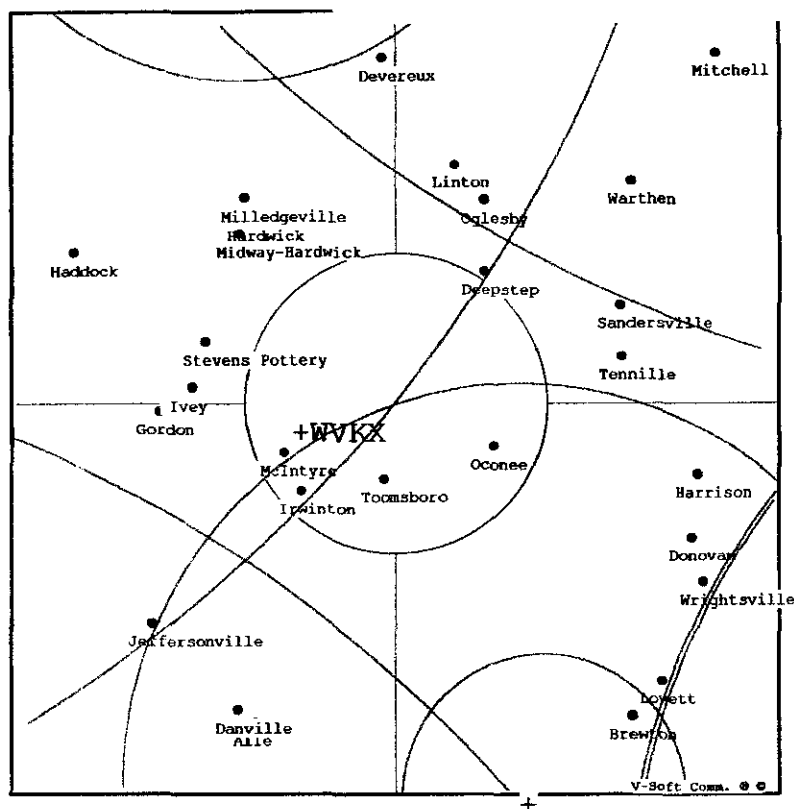
FIGURE THREE

70dBu/Irwinton
GA

FMCONT^(TM) LOCATE STUDY

Ch 278 A
103.5 MHz

N. Lat. 32 53 34
W. Lng. 83 04 02



Call	CH#	Location		D-KM	Azi	FCC	Margin
• WVKX	279A	Irwinton	GA	11.13	262.7	72.0	-60.87
RADD	276C3	East Dublin	GA	42.00	161.9	42.0	0.00
WVEE	277C0	Atlanta	GA	152.19	309.6	152.0	0.19
WZSN	278C3	Greenwood	SC	162.52	29.6	142.0	20.52
WJAD	278C3	Leesburg	GA	164.49	214.7	142.0	22.49
WKKZ	224C2	Dublin	GA	43.95	159.1	15.0	28.95
WDDK	280A	Greensboro	GA	66.67	345.6	31.0	35.67
WBMZ.A	279A	Metter	GA	110.59	119.5	72.0	38.59
ALLO	279A	Metter	GA	111.04	119.4	72.0	39.04
WWSN	277C	Waycross	GA	218.60	151.6	165.0	53.60
WQSY	280C3	Hawkinsville	GA	96.28	213.4	42.0	54.28
WPUP	279C3	Royston	GA	150.25	353.0	89.0	61.25
RDEL	279C3	Royston	GA	150.25	353.0	89.0	61.25
RADD	279C3	Arcade	GA	155.48	346.1	89.0	66.48
WPMX	275C3	Statesboro	GA	114.38	115.5	42.0	72.38
RDEL	275C3	Statesboro	GA	114.38	115.5	42.0	72.38
WULS	279A	Broxton	GA	145.97	172.8	72.0	73.97

- This shortspace eliminated by substitution of Channel 278A for WVKX

Dave Hedrick

EXHIBIT C



Federal Communications Commission
Washington, D.C. 20554

March 27, 2001

H. David Hedrick
P.O. Box 27
317 Stonegables Court
Gray, Georgia 31032

Dear Mr. Hedrick:

This is in response to the petition for rule making which you submitted on February 23, 2001, on behalf of Bernice P. Hedrick, requesting the allotment of Channel 264A to Haddock, Georgia, as the community's first local aural service. To accommodate the allotment at Haddock, the petition also requests the substitution of Channel 234A for Channel 264A at Milledgeville, Georgia, and the modification of Station WLRR's license accordingly.

An engineering review of your proposal shows that Channel 234A cannot be allotted to Milledgeville, at Station WLRR's licensed transmitter site, in compliance with the Commission's minimum distance separation requirements. Instead, the allotment would be short-spaced to Station WBYZ, Channel 233C, Baxley, Georgia, and Station WPCH, Channel 235C1, Atlanta, Georgia. We note that your engineering exhibit states that Channel 234A at Station WLRR's licensed site will work as a 3 kW allotment. However, since October, 1989, all proposals to allot Class A channels must comply with the 6 kW spacing requirements set forth in Section 73.207 of the Commission's Rules. See, Amendment of Part 73 of the Rules to provide for an additional FM station class (Class C3) and to increase the maximum transmitting power for Class A stations, MM Docket 88-375, 4 FCC Rcd 6375 (1989).

Accordingly, based on the above discussion, the request to allot Channel 264A to Haddock and Channel 234A to Milledgeville, Georgia, is not acceptable for consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "John A. Karousos", is written over a large, stylized, light-colored circular mark that resembles a stylized "K" or a large "O".

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

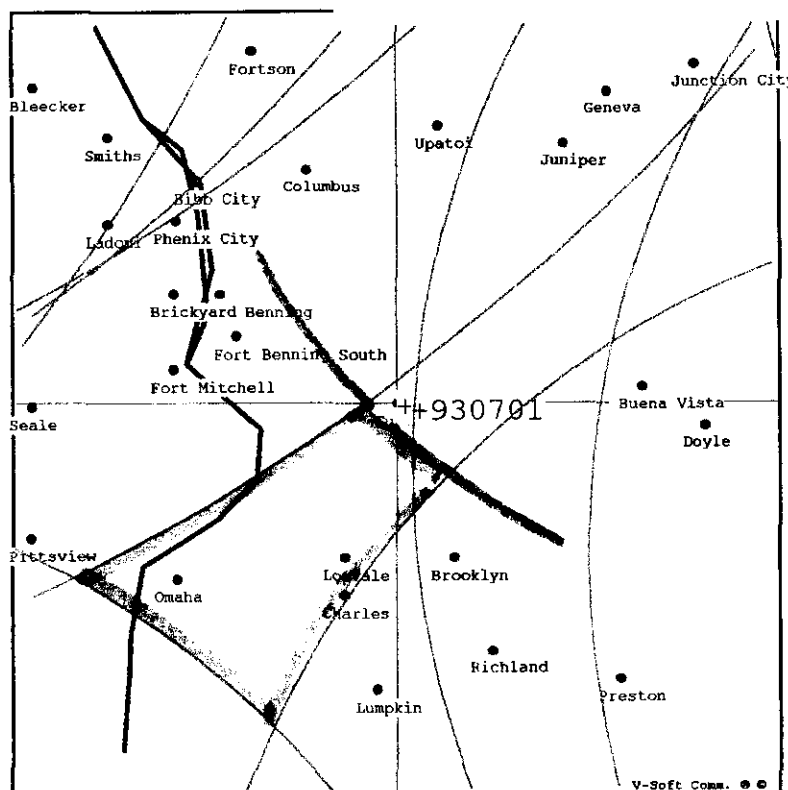
EXHIBIT D

Usable/Cussetta
GA

FMCONT^(TM) LOCATE STUDY

Ch 279 A
103.7 MHz

N. Lat. 32 18 15
W. Lng. 84 46 40



Call	CH#	Location		D-KM	Azi	FCC	Margin
ALLO	279A	Cusseta	GA	0.28	71.8	115.0	-114.72
930701	279A	Cusseta	GA	1.20	355.4	115.0	-113.80
930701	279A	Cusseta	GA	1.62	63.0	115.0	-113.38
RADD	280C3	Montezuma	GA	90.76	93.8	89.0	1.76
RADD	279C	Springville	AL	227.79	324.6	226.0	1.79
ALLO	279C	Gadsden	AL	227.79	324.6	226.0	1.79
WJAD	278C3	Leesburg	GA	97.65	135.9	89.0	8.65
RDEL	280C3	Hawkinsville	GA	109.17	97.7	89.0	20.17
WQSY	280C3	Hawkinsville	GA	109.17	97.7	89.0	20.17
RDEL	279C1	Gadsden	AL	227.79	324.6	200.0	27.79
RDEL	279C1	Gadsden	AL	229.67	317.9	200.0	29.67
WQEN	279C1	Gadsden	AL	229.67	317.9	200.0	29.67
WJRLFM	280C3	Ozark	AL	121.26	217.9	89.0	32.26
RADD	279C1	Trussville	AL	233.81	303.4	200.0	33.81
WMXS	277C	Montgomery	AL	134.00	275.1	95.0	39.00
WVKX	279A	Irwinton	GA	162.58	66.3	115.0	47.58
WALRFM	281C1	La Grange	GA	122.96	357.6	75.0	47.96
WALR.C	281C1	La Grange	GA	122.96	357.6	75.0	47.96
WQLD	282C1	Luverne	AL	135.64	254.7	75.0	60.64
WVEE	277C	Atlanta	GA	166.58	14.2	95.0	71.58

Dave Hedrick

H. David Hedrick
New Tracks Media
P.O. Box 27
Gray, GA 31032

Dear Mr. Hedrick,

This is to certify my understanding with New Tracks Media regarding the channel change that you are proposing for my FM station, WVKX, licensed to Irwinton, Georgia.

In order for you to get 100.1 assigned to Gray, GA, you are proposing to move the WVKX channel (103.7) to Forsyth for use by WQMJ. This necessitates moving WVKX to 103.5. It will also require the construction of a new transmitter/tower complex for WVKX at a new site.

You have conveyed to me your willingness to pay for all costs associated with this move, if you are successful in obtaining a construction permit. This arrangement is acceptable to me.

Regards,



Stan Carter
Wilkinson Broadcasting
Licensee of WVKX

August 31, 2001

CERTIFICATION

State of Georgia)
City of Gray)
Jones County)

H. David Hedrick, under penalty of perjury, declares and says:

That he is a radio broadcast consultant, active in the industry for four decades; having obtained a First Class (currently General) FCC license in 1961. Since Docket 80-90 he has had numerous petitions for FM rulemakings accepted by the Commission.

That he personally prepared the petition and exhibits for New Tracks Media seeking the allocation of Channel 261A to Gray, GA, Substitution of Channel 279A @ Forsyth, GA, Substitution of Channel 278A @ Irwinton, GA & the proposed downgrading of WVEE Atlanta, GA from Class C to C0.

All material and exhibits thereto, are believed to be true and correct, as of the date of this writing.



H. David Hedrick
P O Box 27
Gray, Georgia 31032
478-986-4435
478-986-4071 (fax)

September 1, 2001

CERTIFICATE OF SERVICE

I, H. David Hedrick, hereby certify that on November 20, 2001, the foregoing document is being served by First Class Mail, postage prepaid, to the following:

Gary S. Smithwick, Esq.
Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, NW
Suite 301
Washington, D. C. 20016